REMARKS

This amendment is being submitted in response to the Final Office Action dated February 24, 2005. In the Final Office Action, claims 1, 2, 13, 14, 24, 25, 27, 28, and 35-37 were rejected. Claims 3-11, 15-23, 26 and 29-34 are objected to as being dependent upon a rejected base claim, however, the Examiner indicated that these claims would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. Claim 12 is allowed. By the present Response, claims 1, 13, and 24 are amended, claims 4 and 16 are amended to correct their dependencies, and claims 3, 15 and 26 are canceled. Upon entry of the amendments, claims 1, 2, 4-14, 16-25 and 27-37 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested in light of the above amendments and in view of the arguments herein below.

Rejections Under 35 U.S.C. §102

Claims 1, 2, 13, 14, 24, 25, 27 and 28 are rejected under 35 U.S.C 102(e) as being anticipated by U.S. Patent No. 6,546,124 (hereinafter "Hopple"). Claims 1, 13 and 24 are independent. All of the recited claims are believed to be patentable as discussed below.

Claims 1, 13, and 24 and the Claims Depending Therefrom.

By the present response, independent claim 1 is amended to include the recitation of claim 3 to more particularly point out and distinctly claim the recited subject matter. Claim 4 is amended to correct its dependency in view of the cancellation of claim 3.

Amended claim 1 recites, *inter alia*, a method for compressing an intensity dynamic range of an input image to a reduced intensity dynamic range of an image display device. The method includes defining a plurality of units of the input image. Further, the method includes determining a local mean estimate of an intensity of each of the plurality of units of the input image. The method also includes generating a first value by multiplying a contrast modification function by a mean modification function.

Also, the method includes generating a second value by dividing the first value by the local mean estimate. Further, the method includes accessing a look-up table with reference to the second value and returning a contrast modification processing value for each local mean estimate. Additionally, the method includes generating an output intensity value, for each local mean estimate, by using only the generated contrast modification processing value and an input intensity value.

By the present response, independent claim 13 is amended to include the recitation of claim 15 to more particularly point out and distinctly claim the recited subject matter. Claim 16 is amended to correct its dependency in view of the cancellation of claim 15.

Amended claim 13 recites, *inter alia*, an apparatus for compressing an intensity dynamic range of an input image to a reduced intensity dynamic range of an image display device. The apparatus includes an image detector. Further, the apparatus includes a computer coupled to the image detector and configured to define a plurality of units of the input image, determine a local mean estimate of an intensity of each of the plurality of units of the input image, generate a first value by multiplying a contrast modification function by a mean modification function, generate a second value by dividing the first value by a local mean estimate, access a look-up table with reference to the second value and return a contrast modification processing value, and generate an output intensity value, for each local mean estimate, by using only the generated contrast modification processing value and an input intensity value.

By the present response, independent claim 24 is amended to include the recitation of claim 26 to more particularly point out and distinctly claim the recited subject matter.

Amended claim 24 recites, *inter alia*, a computer readable medium encoded with a program executable by a computer for compressing an intensity dynamic range of an input image to a reduced intensity dynamic range of an image display device. The computer readable medium is configured to define a plurality of units of the input image, determine a local mean estimate of an intensity of each of the plurality of units of the input image, generate a first value by multiplying a contrast modification function by a mean modification function, generate a second value by dividing the first value by a local mean estimate, access a look-up table with reference to the second value and return a contrast modification processing value, and generate an output intensity value, for each local mean estimate, by using only the generated contrast modification processing value and an input intensity value.

The Examiner argues that Hopple is believed to teach a contrast modification value and an output intensity value. Also, the Examiner interprets the contrast modification value recited in the present application to be the boost value that is determined from the look-up tables and the local mean intensity value taught by Hopple. Further, the Examiner points out that the output intensity value may be interpreted as the signal left after the boost output is processed with the input signal (the input intensity processing value).

Applicants have carefully reviewed Hopple and reiterate that the cited reference discloses that the look-up table is addressed *based on a local mean intensity value*. Subsequently, an output from the look-up table is applied to the local mean intensity value to obtain a boost output that is expressed as a percentage of the local mean intensity value. In addition, the output of the boost component is further subtracted from an input signal by an ADD component.

On the contrary, Applicants respectfully submit that in the present application the output intensity value for each local mean estimate is generated based on *only* the

generated contrast modification processing value and the input intensity value. More particularly, in the present technique, a contrast modification value and a mean modification function are multiplied to generate a first value. Additionally, the first value is subsequently divided by the local mean estimate to generate a second value. Further, a look-up table is accessed *with reference to the second value* to generate the contrast modification processing values.

Hence, Applicants submit that the boost value of Hopple and the contrast modification processing value as claimed are not analogous. Therefore, for at least the above reasons, the present technique as recited in claims 1, 13 and 24 is not anticipated by Hopple. Further, claims 2 and 4-11, 14 and 16-23, and 25 and 27-34 depend directly or indirectly from independent claims 1, 13 and 24 respectively. Accordingly, Applicants submit that the dependent claims are allowable by virtue of their dependency from allowable base claims, as well as for the subject matter they separately recite. Thus, it is respectfully requested that the rejection under 35 U.S.C 102(e) be withdrawn.

Rejections Under 35 U.S.C. §103

Claim 35 was rejected under 35 U.S.C. §103(a) as being unpatentable over Hopple in view of U.S. Patent No. 6,711,302 (hereinafter "Lee"). Claim 37 is rejected as being unpatentable over Hopple in view of U.S. Patent No. 6,370,265 (hereinafter "Bell").

Applicants submit that because the present application was filed on August 8, 2001, Hopple may not be used as prior art under 35 U.S.C. §103(c). That is, Hopple only qualifies as prior art under 35 U.S.C. §102(e), and the present application and Hopple share a common assignee, General Electric Company. Thus, because Hopple is unavailable as prior art, a *prima facie* case of obviousness cannot be supported based only upon the remaining references. Further, claim 36 is allowable by virtue of its dependency from allowable base claim 35, as well as for the subject matter it

separately recites. Therefore, Applicants respectfully request that the rejections of claims 35-37 under 35 U.S.C. §103(a) be withdrawn.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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